



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

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M-00011530

September 16, 2004

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary, 445 12th Street, SW
Washington, D.C. 20554

Irene Flannery, Administrator
Universal Service Administrative Co.
2120 L Street N.W. Suite 600
Washington, D.C. 20037

Re: State Certification of Rural Carriers for Federal Universal Service High Cost
Support For January 1, 2005 through December 31, 2005
In the Matter of Federal-State Joint Board on Universal Service
CC Docket No. 96-45

Dear Secretary Dortch and Administrator Flannery:

Pursuant to the requirements of Section 54.316 of the Code of Federal Regulations, the Pennsylvania Public Utility Commission ("PaPUC") hereby certifies to the Federal Communications Commission and the Universal Service Administrative Company that the PaPUC has reviewed the comparability of Verizon Pa's and Verizon North's residential rates in their rural areas, and hereby certifies that the residential rates are reasonably comparable to the nationwide urban rates for purposes of section 254(b)(3) of the Telecommunications Act of 1996. In making this certification, Pennsylvania is relying upon the Safe Harbor provision of Section 54.316(b) as the residential rates in Verizon PA's and Verizon North's rural areas are below the nationwide urban rate benchmark of \$34.16 per Table 1.13 of the FCC's Reference Book released July 2004. Attached, please find a sworn affidavit from Verizon PA and Verizon North attesting to their rates.

Please time stamp the extra copy of this filing and return it to the Elizabeth Barnes, Assistant Counsel, in the enclosed stamped, self-addressed envelope.

Sincerely,

James J. McNulty
Secretary

Attachment

cc: Elizabeth Barnes, Assistant Counsel
James V. O'Rourke, President and CEO Verizon Pennsylvania, Inc.

Appendix C

James V. O'Rourke
President and
Chief Executive Officer
Verizon Pennsylvania Inc.



1717 Arch Street, 17th Floor
Philadelphia, PA 19103

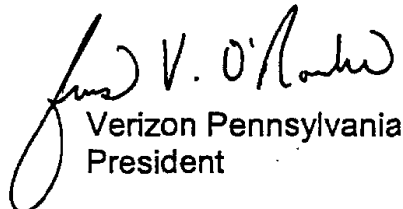
Phone 215 466-8700
Fax 215 466-8515
james.v.orourke@verizon.com

August 26, 2004

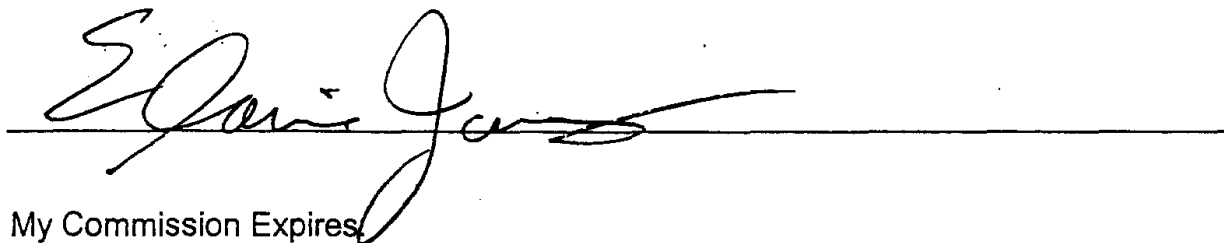
Elizabeth Barnes
Assistant Counsel
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Verizon's Rate Comparability Review per the FCC's New Rate
Comparability Rules for Non-Rural Carriers, CC Docket No. 96-45**

I hereby verify under oath that the rates shown in the attached spreadsheet were the true and correct residence local rates in effect for Verizon Pennsylvania and Verizon North in Density Cell 4 on October 15, 2003.


Verizon Pennsylvania
President

Sworn to and subscribed before me this 26th day of August 2004


My Commission Expires

Notarial Seal
Elaine Jones, Notary Public
Philadelphia, Philadelphia County
My Commission Expires Sept. 21, 2004

Member, Pennsylvania Association of Notaries

Attachment

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Rate Comparison related to Section 54.316 of the Code of Federal Regulations

§54.316 - Rate comparability review and certification for areas served by non-rural carriers

b) Safe Harbor - For the purposes of its certification, a state may presume that the residential rates in rural areas served by non-rural incumbent local exchange carriers are reasonably comparable to urban rates nationwide if the rates are below the nationwide urban rate benchmark.

Nationwide urban rate benchmark = **\$34.16** per Table 1.13 of the FCC's Reference Book released July 2004

Verizon's Residence Rates in Rural Areas as of Oct. 15, 2003

Residential Rates for Local Service	Verizon PA - Cell 4			Verizon North - Cell 4		
Usage Rate Group	A	D	F	A	D	F
DTL	\$5.68	\$5.68	\$5.68	\$5.68	\$5.68	\$5.68
Local Area Unlimited	\$3.80	\$5.20	\$6.85	\$5.82	\$7.05	\$8.10
Monthly Charge for Flat-Rate Service	\$9.48	\$10.88	\$12.53	\$11.50	\$12.73	\$13.78
Federal SLC	\$6.10	\$6.10	\$6.10	\$6.50	\$6.50	\$6.50
LNP Surcharge	\$0.23	\$0.23	\$0.23	\$0.36	\$0.36	\$0.36
USF Surcharge	\$0.59	\$0.59	\$0.59	\$0.64	\$0.64	\$0.64
911 Surcharge (ranges from \$0.00 to \$1.50)	\$1.25	\$1.25	\$1.25	\$1.25	\$1.25	\$1.25
Relay Surcharge	\$0.08	\$0.08	\$0.08	\$0.08	\$0.08	\$0.08
Federal Tax	\$0.53	\$0.57	\$0.62	\$0.61	\$0.65	\$0.68
Surcharges and Taxes	\$2.68	\$2.72	\$2.77	\$2.94	\$2.98	\$3.01
Total Monthly Charge for Flat-Rate Service	\$18.26	\$19.70	\$21.40	\$20.94	\$22.21	\$23.29

∴ The Safe Harbor provision is applicable because all of Verizon's rural residence rates for local service, including surcharges and taxes, are less than the nationwide urban rate benchmark.

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